

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF INDIANA
EVANSVILLE DIVISION

EDWARD C. SNUKIS, JR. and)
SAMANTHA SNUKIS,)
Co-Administrators of the Estate of)
Edward C. Snukis,)
Plaintiffs,)
vs.) CASE NO. 3:21-cv-00135-MPB-MJD
)
CITY OF EVANSVILLE, INDIANA;)
MATTHEW O. TAYLOR, in his individual)
capacity as an Evansville police officer;)
TREVOR KOONTZ, in his individual)
capacity as an Evansville police officer; and)
NICHOLAS HACKWORTH, in his)
individual capacity as an Evansville police officer,)
Defendants.)

DEFENDANTS' FINAL WITNESS AND EXHIBIT LISTS

Defendants, by counsel and pursuant to the Order on Case Management Plan [Dkt. 110, §III(I); Dkt. 165], hereby submit their Final Witness and Exhibit Lists.

Witnesses

1. Evansville Police Department (“EPD”) Officer Matthew O. Taylor, who will testify regarding the events surrounding the encounter with Edward Snukis;
2. Trevor Koontz, who will testify regarding the events surrounding the encounter with Edward Snukis;
3. EPD Officer Nicholas Hackworth, who will testify regarding the events surrounding the encounter with Edward Snukis;
4. EPD Officer J. Holden, who will testify regarding the events surrounding the encounter with Edward Snukis;

5. Cyril Fraker, who will testify regarding his observations of Edwards Snukis prior to Snukis's encounter with EPD officers;

6. Derrick Norton, who will testify regarding his observations of Edwards Snukis prior to Snukis's encounter with EPD officers;

7. Brentless Spurlock, who will testify regarding his observations of Edwards Snukis prior to Snukis's encounter with EPD officers;

8. Stephanie Spurlock, who will testify regarding her observations of Edwards Snukis prior to Snukis's encounter with EPD officers;

9. Bradley Angel, who will testify regarding his observations of Edwards Snukis after Snukis's encounter with EPD officers;

10. Kayla Stone, who will testify regarding her observations of Edwards Snukis after Snukis's encounter with EPD officers;

11. EPD Officer David Brown, who will testify regarding the events surrounding EPD Officers' encounter with Edward Snukis and subsequent investigation;

12. EPD Sergeant S. Brown, who will testify regarding the events surrounding EPD Officers' encounter with Edward Snukis and subsequent investigation;

13. EPD Sergeant J. McQuay, who will testify regarding the events surrounding EPD Officers' encounter with Edward Snukis and subsequent investigation;

14. EPD Detective K. Campbell, who will testify regarding the events surrounding EPD Officers' encounter with Edward Snukis and subsequent investigation;

15. EPD Officer J. Holden, who will testify regarding the events surrounding EPD Officers' encounter with Edward Snukis and subsequent investigation;

16. EPD Sergeant Kevin Day, who will testify regarding the events surrounding EPD Officers' encounter with Edward Snukis and subsequent investigation;
17. EPD Officer Gorman, who will testify regarding the events surrounding EPD Officers' encounter with Edward Snukis and subsequent investigation;
18. EPD Officer Toney, who will testify regarding the events surrounding EPD Officers' encounter with Edward Snukis and subsequent investigation;
19. EPD Officer D. Vonderscher, who will testify regarding the events surrounding EPD Officers' encounter with Edward Snukis and subsequent investigation;
20. EPD Officer K. Montgomery, who will testify regarding the events surrounding EPD Officers' encounter with Edward Snukis and subsequent investigation;
21. EPD Detective Evans, who will testify regarding the events surrounding EPD Officers' encounter with Edward Snukis and subsequent investigation;
22. EPD Officer Anthony Aussieker, who will testify regarding the events surrounding EPD Officers' encounter with Edward Snukis and subsequent investigation;
23. EPD Detective Aaron McCormick, who will testify regarding the events surrounding EPD Officers' encounter with Edward Snukis and subsequent investigation;
24. EPD Officer Wheeler, who will testify regarding the events surrounding EPD Officers' encounter with Edward Snukis and subsequent investigation;
25. EPD Officer T. Lincoln, who will testify regarding the events surrounding EPD Officers' encounter with Edward Snukis and subsequent investigation;
26. EPD Officer Aaron Kennedy, who will testify regarding the events surrounding EPD Officers' encounter with Edward Snukis and subsequent investigation;

27. EPD Detective Chris Jones, who will testify regarding the events surrounding EPD Officers' encounter with Edward Snukis and subsequent investigation;

28. EPD Captain Paul Kirby, who will testify regarding the events surrounding EPD Officers' encounter with Edward Snukis and related EPD policies and training;

29. EPD Detective Josey Lewis, who will testify regarding the events surrounding EPD Officers' encounter with Edward Snukis and subsequent investigation;

30. Chrisney Johnson a.k.a. Chrisney McGowan, who will testify regarding the events surrounding EPD Officers' encounter with Edward Snukis;

31. Matt Madden, who will testify regarding the events surrounding EPD Officers' encounter with Edward Snukis;

32. Jean Cox, who will testify regarding the events surrounding EPD Officers' encounter with Edward Snukis;

33. Amanda Riordan, who will testify regarding the events surrounding EPD Officers' encounter with Edward Snukis

34. Dennis Smiley, who will testify regarding the events surrounding EPD Officers' encounter with Edward Snukis;

35. Devon Holley, who will testify regarding the events surrounding EPD Officers' encounter with Edward Snukis;

36. Jason Gee, who will testify regarding the events surrounding EPD Officers' encounter with Edward Snukis;

37. Justin Robinson, who will testify regarding the events surrounding EPD Officers' encounter with Edward Snukis;

38. Kylene Page, who will testify regarding the events surrounding EPD Officers' encounter with Edward Snukis;

39. Evansville Fire Department witnesses, who will testify regarding the events surrounding EPD Officers' encounter with Edward Snukis;

40. Dr. Christopher Kiefer, who will testify regarding the events surrounding Edward Snukis' death and determination as to the cause of his death;

41. Matthew C. Sophy, D.O., who will testify regarding Edward Snukis' health;

42. Sara A. Ford, MRC, who will provide expert testimony regarding Plaintiffs' claim for damages;

43. Howard S. Robin, M.D., who will provide expert testimony regarding the events surrounding Edward Snukis' death and determination as to the cause of his death;

44. Charles P. Stephenson, who will provide expert testimony regarding the events surrounding EPD's encounter with Edward Snukis;

45. Mark Kroll, who will provide expert testimony regarding the events surrounding EPD's encounter with Edward Snukis and other subject matter contained within his expert report; and

46. Each witness necessary required for the admissibility of any exhibit, including to authenticate and/or provide the foundation for any exhibit.

Defendants reserve the right to deviate from this list of individuals and to call named individuals not listed above for the purpose of impeachment and/or surrebuttal.

Exhibits

1. 911 Call [Dkt. 149];
2. CAD Report [Dkt. 121-1];

3. Aerial Photo [Dkt. 117-4];
4. Trevor Koontz Body Camera Videos (3);
5. Matthew Taylor's Body Camera Video (1);
6. Matthew Taylor's Dash Camera Videos (2);
7. Nicholas Hackworth's Body Camera Video (1);
8. Nicholas Hackworth's Dash Camera Videos (2);
9. Autopsy Report [Dkt. 121-8];
10. Plaintiffs' Statement of Claims [Dkt. 94];
11. Plaintiffs' Complaint [Dkt. 1];
12. EPD Operational Guidelines [Dkt. 121-12];
13. EPD Incident Reports [Dkt. 121-3; Dkt. 121-2];
14. EPD Use of Force Reports relating to the encounter with Edwards Snukis;
15. American Medical Response Records [AMR 001-AMR026];
16. AT&T Records [ATT 1 – ATT 5764];
17. Matthew C. Sophy Records [SOPHY 1 – SOPHY 32];
18. Ascension St. Vincent Evansville Records [Ascension 1 – Ascension 36];
19. Evansville Fire Department Records [EFD 1 – EFD 5];
20. Lehigh Valley Hospital Records [Uzoukwu 1 – Uzoukwu 108; Lehigh Valley 1 – Lehigh Valley 53];
21. MHS Labs Records [MHS Labs 1 – MHS Labs 17]; and
22. Walmart Records [Walmart Pharmacy 1 – Walmart Pharmacy 19].

Defendants reserve the right to call additional witnesses and/or introduce additional exhibits for the purposes of impeachment or surrebuttal. By listing the foregoing exhibits, Defendants do not concede the admissibility of any exhibit.

Respectfully submitted,

ZIEMER, STAYMAN, WEITZEL & SHOULDERS, LLP

BY: /s/ Clifford Whitehead

Robert L. Burkart, #16664-82
Clifford Whitehead, #28836-49
Bernard J. Lobermann, IV, #36886-49
20 N.W. First Street
P.O. Box 916
Evansville, IN 47706-0916
Phone: (812) 424-7575
Fax: (812) 421-5089
E-Mails: rburkart@zsws.com
cwhitehead@zsws.com
blobermann@zsws.com

Attorneys for Defendants

CERTIFICATE OF SERVICE

I hereby certify that on November 27, 2023, service of a true and complete copy of the foregoing was filed electronically. Notice of this filing will be sent to the following parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.

/s/ Clifford Whitehead

Clifford Whitehead